

From: Levi Huebner Esq
Sent: Monday, December 28, 2020 3:09 PM
To: Jonathan M. Ettman, Esq. <jettman@fykglaw.com>
Subject: 12/29/2020; Express Freight Systems, Inc. v YMB Enterprises, Inc., et al.; Assignment No. 4374837; Status: Scheduled

Dear Mr. Ettman:

Please be advised that our call was conducted on speaker phone and my associate was present when you rudely hung up. Furthermore, I contacted my VOI carrier and they confirmed that that will request the electronic information from your carrier to furnish evidence indicating that you disconnected the call.

Please be reminded, my client is available tomorrow via cell phone. As you have failed to furnish an alternative, he will not be able to review any documents, unless, you send someone to hand each document to my client. (And simultaneously furnish a copy of the same document to counsel).

Needless, to say, you continue to refuse pursuant to FRCP 30 (B) (6) to apprise defendant and “describe with reasonable particularity the matters for examination.”

Please be further advised that your failure to cooperate will not be to my client’s detriment.

If you choose to proceed tomorrow without resolving the foregoing that will be to Plaintiff’s detriment.

Thank you for your consideration in this matter. Please feel free to contact the undersigned with any questions.

Very truly yours,
Levi Huebner

Levi Huebner & Associates, PC
Attorneys and Counselors at Law

488 Empire Boulevard, Suite 100
Brooklyn, NY 11225
Tel: (212) 354-5555
Fax: (718) 636-4444

EMAIL: NEWYORKLAWYER@MSN.COM

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